

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

PETER MILLER, CLIFFORD HOYT, and	:
CAMBRIDGE RESEARCH AND	:
INSTRUMENTATION, INC.	:
	:
Plaintiffs,	:
	:
v.	:
	:
PATRICK TREADO and CHEMIMAGE CORP.	:
	:
Defendants.	:
	:

**ASSENTED-TO MOTION OF DEFENDANTS FOR LEAVE TO FILE BRIEF IN
EXCESS OF TWENTY PAGES IN LENGTH IN RESPONSE TO PLAINTIFFS'
MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT**

Pursuant to Local Rule 7.1(B)(4), defendants Patrick Treado and ChemImage Corp. respectfully move for leave to file a brief of forty-one pages in length in response to the plaintiffs' motion for leave to file an amended complaint (docket entry 40). The proposed amended complaint is thirty-six pages long (twenty-four pages longer than the original complaint); contains nine entirely new counts (including complex counts such as RICO and civil conspiracy); and has 34 exhibits appended thereto. An opposition brief in excess of the twenty-page limit is necessary to address the many and complex issues raised by the motion for leave to amend.

The plaintiffs have assented to this motion.

WHEREFORE, the defendants respectfully request that the Court grant leave to file a brief of 41 pages in length in response to the plaintiffs' motion for leave to file an amended complaint (docket entry 40).

PATRICK TREADO AND CHEMIMAGE CORP.

By their attorneys,

/s/ Anthony J. Fitzpatrick
Anthony J. Fitzpatrick (BBO # 564324)
Duane Morris LLP
470 Atlantic Avenue, Suite 500
Boston, MA 02210
Telephone: 617.289.9220
Fax: 617.289.9201
e-mail: ajfitzpatrick@duanemorris.com

Paul D. Weller (admitted *pro hac vice*)
Morgan, Lewis & Bockius, LLP
1701 Market Street
Philadelphia, PA 19103
Telephone: 215.963.5530
eFax: 215.963.5001
e-mail: pweller@morganlewis.com

June 19, 2006

LOCAL RULE 7.1 CERTIFICATION

Pursuant to 7.1(A)(2), the undersigned certifies that counsel for the defendants have conferred with counsel for plaintiffs regarding the issue raised in the foregoing motion. Counsel for plaintiffs have assented to the request.

/s/ Anthony J. Fitzpatrick
Anthony J. Fitzpatrick

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on June 19, 2006.

/s/ Anthony J. Fitzpatrick
Anthony J. Fitzpatrick

DM2\718888.1